

2. I am presently employed by the Post, and have been the Post's Special Sections Editor since 2002. My duties and responsibilities include, among other things, preparing and/or overseeing the creation of editorial content for the Post's special sections, editing the Post's special sections, and developing potential new special sections to run in the Post. Prior to

becoming the becoming the Special Sections Editor, I worked on the Post's Metro Desk as an editor, starting in or about 1998.

3. As the Special Section editor, I edit more than 40 special sections each year, and have done so since prior to 2007. Special sections are periodic supplements to the *New York Post* newspaper and concern a specific topic (like Education) or cultural event (like Black History month or the Fourth of July), among other things. Each special section is expected to generate a profit from sales of advertising to be run in the section, and page length for each special section is determined by the amount of advertising sold for that special section. The more advertising we sell, the more editorial content we can include; thus, the size of the section is dependent on advertising sales.

4. In or about early 2007, Chris Shaw was my direct supervisor. He was also Sandra Guzman's direct supervisor. At that time, Mr. Shaw spoke to me about reassigning some of the special sections which I edited to Ms. Guzman. He explained that this was because *Tempo*, the only monthly section which Ms. Guzman then edited, had gotten smaller in size and that, as a result, Ms. Guzman needed additional work to fill her time. Based on that discussion, in 2007, and again in 2008, I transferred responsibility for some special sections I edited to Ms. Guzman to edit.

5. The sections I transferred to Ms. Guzman, which were well within my ability to edit along with the other sections I edited, did not represent substantial work. These sections were primarily short sections which required little and sometimes no editing and/or story assignment. I would estimate that all of these sections represent approximately 10% of my present workload.

6. For example, the periodic education sections that I transferred to Ms. Guzman typically ran at a maximum of 8 total pages, with only up to about 3.5 pages of editorial content, or up to three to six stories per section. Generating content for these education sections is easier and less time consuming than for other sections, and, because of the similarity in content between sections, stories that were cut from one section may be repurposed for subsequent sections. The *College Planning* section that Ms. Guzman edited was comprised *entirely* of advertiser-provided content. Similarly, the *Macy's Fourth of July* section was produced with significant editorial input from Macy's. And approximately half the editorial content of the *St. Patrick's Day* and *Columbus Day Parade* sections that I transferred to Ms. Guzman consisted of the "Line of March," which is information about the parades supplied by the parade organizers, requiring no editing.


7. Separately, on two occasions Ms. Guzman edited sections – a *Casino* section and a *Commercial Real Estate* section – under my responsibility because I was unavailable for personal reasons. These sections were not transferred to her, but she was only asked to assist at a time when I was temporarily out of the office.

8. In or about September 2009, Mr. Robinowitz informed me that responsibility for the sections other than *Tempo* that Ms. Guzman had been editing would be returned to me, to the extent they would be published in the future at all. I had absolutely no hesitation about taking those sections back into my workload, and I resumed responsibility for them without any problem. I received the same annual performance evaluation score in 2010 and 2011 as I had in 2009 when Ms. Guzman edited some of the sections (that score being, "4 – Exceeds Standards").

9. Consistent with the general downturn in our industry, some of the sections that had been edited by me, and temporarily by Ms. Guzman before she left the Post, have not run

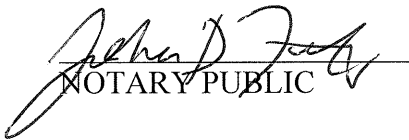
again because they were not profitable. These sections include the *Columbus Day Parade* section and the *Go Green* section (with an environmental theme), neither of which has been published since.

10. I am the Post's only Special Sections Editor. The Post has not hired any additional employee to work on the special sections since the time of Ms. Guzman's termination, and I have not transferred any special sections to another Post employee.

  
Carole Sovocool

Sworn to before me this

6th day of May 2013

  
NOTARY PUBLIC

JOSHUA D. FULOP  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 02FU6208919  
Qualified in Queens County  
My Commission Expires July 18, 2013